

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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| MARK DANIELS, RASHID RAHMAN, and | : |
| FELIPE RIVERA-CRUZ on behalf of themselves | : |
| and others similarly situated | : |
| | : |
| | : |
| Plaintiffs, | : |
| | : |
| - against - | : |
| | : |
| DR. CAROL MOORES | : |
| | : |
| | : |
| Defendant. | X |
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19-CV-8173(LAP)

PROPOSED PRETRIAL ORDER

Pursuant to this Court's Order, Plaintiffs propose the following Pretrial Order:

i. CAPTION

The proposed caption of this case for trial will be *Mark Daniels, Rashid Rahman, and Felipe Rivera-Cruz, on behalf of themselves and others similarly situated vs. Dr. Carol Moores*, 19-cv-8173(LAP) as set forth above.

ii. THE AMOUNT OF TRIAL TIME FOR PLAINTIFFS' CASE IN CHIEF

Pursuant to the Court's order Plaintiffs have fifteen courtroom hours to present their case-in-chief as well as rebuttal.

iii. TRIAL COUNSEL

For Plaintiff Class:

Amy Jane Agnew
Joshua Morrison
Shira Nabatian, Law Student
Baron Jones, Law Student
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For Defendant Moores:

Oriana L. Kiley, Esq.
William S. Nolan, Esq.
Gabriella R. Levine, Esq.
Jennifer M. Thomas, Esq.
Whiteman Osterman & Hanna LLP
One Commerce Plaza
Albany, New York 12260
Telephone: (518) 487-7600
Fax: (518) 487-7777

iv. JURISDICTION

Plaintiff Class:

This Court has subject matter jurisdiction under 28 U.S.C §§ 1331 and 1343. Plaintiffs bring this action pursuant to 42 U.S.C. § 1983 for violation of their rights secured by the Eighth Amendment to the United States Constitution.

Defendant Moores:

For the reasons articulated more fully in Dr. Moores' opposition to Plaintiffs' motion for a preliminary injunction (Dkt. No. 449, 489), post-hearing brief (Dkt. No. 536), motion for a stay of this Court's preliminary injunction order (Dkt. No. 606-1), this Court lacks subject matter jurisdiction over this trial for a permanent injunction because: (1) Plaintiffs' arguments in support of their claim for permanent injunctive relief are based on events and issues that were not alleged in and otherwise post-date the filing of the Second Amended Complaint, (2) Plaintiffs do not have a cognizable claim for equitable relief tied to their Second Claim for Relief, which

is the alleged basis for the injunction, and, finally, (3) Plaintiffs' request for injunctive relief has been rendered moot. See, e.g., Fox v. Bd. of Trustees of State Univ. of New York, 42 F.3d 135, 140 (2d Cir.

1994) ("When a case becomes moot, the federal courts lack[] subject matter jurisdiction over the action.") (internal quotation marks and citations omitted).

v. SUMMARY OF CLAIMS AND DEFENSES

Plaintiff's Claims:

a. Plaintiff's claims to be tried:

This is a 42 U.S.C. 1983 trial where the Plaintiff Class seeks permanent injunction be entered against Defendant Moores in her official capacity to cure ongoing policies, practices and customs of DOCCS medical providers that unconstitutionally deny and/or discontinue necessary and effective pain medication of the class without medical justification or individual needs of class members.

The Plaintiff Class will prove by a preponderance of the evidence that DOCCS' medical providers' policies, practices and customs violate their rights secured by Eighth Amendment to the U.S. Constitution and place them in a likely and substantial risk of their Eighth Amendment rights to be violated in the future by denying or discontinuing effective and necessary medications deemed to have abuse potential for reasons other than medical judgment and need.

b. Defendant Moores' Defenses

A. Whether Plaintiffs can satisfy their burden to prove, by a preponderance of the evidence, that DOCCS providers have violated – and continue to violate on an ongoing

basis – the Plaintiff Class’ rights against Eighth Amendment deliberate indifference to medical care by demonstrating:

- (i) the Plaintiff Class has suffered an objectively and sufficiently serious deprivation of adequate medical care, and
- (ii) that DOCCS medical providers subjectively act with deliberate indifference by being aware of, but disregarding, a substantial risk of serious harm to the health of the Plaintiff Class members;

B. If the Court determines that Plaintiffs Class has actually succeeded on the substantive Eighth Amendment deliberate indifference claim outlined above, the issue then becomes whether Plaintiffs are entitled to an equitable remedy in the form of a permanent injunction. To satisfy their burden for entitlement to a permanent injunction, Plaintiff Class must prove, by a preponderance of the evidence, that:

- (i) The Plaintiff Class will be irreparable harmed in absence of a permanent injunction;
- (ii) That the balancing of the equities tips in their favor;
- (iii) There is no adequate remedy at law available to Plaintiff Class members absent a permanent injunction; and
- (iv) That the public interest will be harmed absent a permanent injunction.

In addition, Defendant has asserted several affirmative defenses that raise legal issues for the Court’s consideration, including:

- A. Whether Plaintiffs lack standing;
- B. Whether the Court lacks subject jurisdiction over Plaintiffs’ Second Cause of Action

because:

- (i) Plaintiffs' arguments in support of their claim for permanent injunctive relief are based on events and issues that were not alleged in and otherwise post-date the filing of the Second Amended Complaint,
 - (ii) Plaintiffs do not have a cognizable claim for equitable relief tied to their Second Claim for Relief, which is the alleged basis for the permanent injunction, and, finally,
 - (iii) Plaintiffs' request for permanent injunctive relief has been rendered moot; and
- C. Whether Plaintiffs' request for permanent injunctive relief is barred by the Eleventh Amendment because Plaintiffs have failed to establish an ongoing violation of federal law.

vi. NO TRIAL BY JURY

As this is a class action suit for injunctive and declaratory relief, no jury will be empaneled. The estimated length of trial will be 30 hours.

vii. TRIAL BY MAGISTRATE JUDGE

One or both of the parties refused consent to trial by a magistrate judge.

viii. STIPULATIONS

There are no stipulations despite the Plaintiff Class's repeated attempts.

ix. LIST OF WITNESSES IN CASE IN CHIEF:

- a. Plaintiff's Witness List

1. Dr. Adam Carinci. Dr. Carinci will testify as to the contents of his expert report, including his physical examination of seventeen class members and his conclusions regarding the impact of the MWAP Policy on patient health.

2. David Dinello. Dinello will testify to being the architect of the MWAP Policy and confirm that when asked under oath why the hundreds of class members in this suit would sue if they were so happy to lose their medication, he replied, “but did they die?” Dinello will also testify to not having bothered reading this Court’s contempt decision in *Medina II* and making no efforts to revisit the MWAP Policy in light of same. Dinello will also testify that MWAP was a “great success” and reaped the intended results.

3. Dr. Susan Mueller. Susan Mueller will testify to her knowledge regarding the Narcotics Review Committee, Project Neurontin, the implementation of the MWAP Policy, the number of patients whose medications she discontinued both before and during MWAP, her issues with providers during the MWAP regime and the consequences to patient care.

4. Dr. Carol Moores. Dr. Moores will testify to her knowledge of the MWAP Policy, that 80% of the providers she spoke with did not support the policy, the promulgation of Policy 1.24A, the implementation of 1.24A, the reassessment process and the steps she has taken to implement 1.24A and implement the Court’s preliminary injunction order.

5. Ronald Alston (may call). Mr. Alston will testify to his chronic pain, his medical treatment under the MWAP Policy regime and his treatment since the MWAP Policy was rescinded and 1.24A was implemented. Mr. Alston will also testify about avenues to care, including how the sick call system operates in his current facility.

6. Anthony Jackson (may call). Mr. Jackson will testify to his chronic pain, his medical treatment under the MWAP Policy regime and his treatment since the MWAP Policy was rescinded and 1.24A was implemented. Mr. Jackson will also testify about avenues to care, including how the sick call system operates in his current facility.

7. Anthony Griggs (may call). Mr. Griggs will testify to his chronic pain, his medical treatment under the MWAP Policy regime and his treatment since the MWAP Policy was rescinded and 1.24A was implemented. Mr. Griggs will also testify about avenues to care, including how the sick call system operates in his current facility.

8. Ramal Myriee (may call). Mr. Myriee will testify to his chronic pain, his medical treatment since he matriculated into DOCCS’ custody and his previous effective treatment with MWAP medications. Mr. Myriee will also testify about avenues to care, including how the sick call system operates in his current facility.

9. Mark Daniels (may call). Mr. Daniels will testify to his chronic pain, his medical treatment under the MWAP Policy regime and his treatment since the MWAP Policy was rescinded and 1.24A was implemented. Mr. Mathis will also testify about avenues to care,

including how the sick call system operates in his current facility. Mr. Mathis will also testify about the recent reinstatement of his effective treatment and how it was summarily discontinued upon his transfer to Woodbourne Correctional Facility.

10. Richard Vasquez (may call). Mr. Vasquez will testify to his chronic pain, his medical treatment since he matriculated into DOCCS' custody and his previous effective treatment with MWAP medications. Mr. Vasquez will also testify about avenues to care, including how the sick call system operates in his current facility.

11. Rafael Montanez (may call). Mr. Montanez will testify to his chronic pain, his medical treatment under the MWAP Policy regime and his treatment since the MWAP Policy was rescinded and 1.24A was implemented. Mr. Montanez will also testify about avenues to care, including how the sick call system operates in his current facility.

12. James Pine, Sr. (may call). Mr. Pine will testify to his chronic pain, his medical treatment under the MWAP Policy regime and his treatment since the MWAP Policy was rescinded and 1.24A was implemented. Mr. Pine will also testify about avenues to care, including how the sick call system operates in his current facility and how his MWAP medications were discontinued recently upon transfer.

13. John Crosby (may call). Mr. Crosby will testify to his chronic pain, his medical treatment under the MWAP Policy regime and his treatment since the MWAP Policy was rescinded and 1.24A was implemented. Mr. Crosby will also testify about avenues to care, including how the sick call system operates in his current facility.

14. Thomas Curry (may call). Mr. Curry will testify to his chronic pain, his medical treatment since he matriculated into DOCCS' custody and his previous effective treatment with MWAP medications. Mr. Curry will also testify about avenues to care, including how the sick call system operates in his current facility.

15. Eric Lindemann (may call). Mr. Lindemann will testify to his chronic pain, his medical treatment since he matriculated into DOCCS' custody and his previous effective treatment with MWAP medications. Mr. Lindemann will also testify about avenues to care, including how the sick call system operates in his current facility.

16. Tina Vivenzio (may call). Ms. Vivenzio will testify to her chronic pain, her medical treatment under the MWAP Policy regime and her treatment since the MWAP Policy was rescinded and 1.24A was implemented. Ms. Vivenzio will also testify about avenues to care, including how the sick call system operates in her current facility.

17. Marc Confessore (may call). Mr. Confessore will testify to his chronic pain, his medical treatment since he matriculated into DOCCS' custody and his previous effective treatment with MWAP medications. Mr. Confessore will also testify about avenues to care, including how the sick call system operates in his current facility.

18. Alan Sherry (may call). Mr. Sherry will testify to his chronic pain, his medical treatment since he matriculated into DOCCS' custody and his previous effective treatment with MWAP medications. Mr. Sherry will also testify about avenues to care, including how the sick call system operates in his current facility.

19. Matthew Herbert (may call). Mr. Herbert will testify to his chronic pain, his medical treatment since he matriculated into DOCCS' custody and his previous effective treatment with MWAP medications. Mr. Herbert will also testify about avenues to care, including how the sick call system operates in his current facility.

20. Miguel Tirado (may call). Mr. Tirado will testify to his chronic pain, his medical treatment since he matriculated into DOCCS' custody and his previous effective treatment with MWAP medications. Mr. Tirado will also testify about avenues to care, including how the sick call system operates in his current facility.

21. Thomas Briel (may call). Mr. Briel will testify to his chronic pain, his medical treatment since he matriculated into DOCCS' custody and his previous effective treatment with MWAP medications. Mr. Briel will also testify about avenues to care, including how the sick call system operates in his current facility.

22. Robert Oleman (may call). Mr. Oleman will testify to his chronic pain, his medical treatment under the MWAP Policy regime and his treatment since the MWAP Policy was rescinded and 1.24A was implemented. Mr. Oleman will also testify about avenues to care, including how the sick call system operates in his current facility and how his MWAP medications were discontinued recently upon transfer.

23. Wayne Stewart (may call). Mr. Stewart will testify to his chronic pain, his medical treatment under the MWAP Policy regime and his treatment since the MWAP Policy was rescinded and 1.24A was implemented. Mr. Stewart will also testify about avenues to care, including how the sick call system operates in his current facility and how his MWAP medications were discontinued recently upon transfer.

24. Samson Burch (may call). Mr. Burch will testify to his chronic pain, his medical treatment under the MWAP Policy regime and his treatment since the MWAP Policy was rescinded and 1.24A was implemented. Mr. Burch will also testify about avenues to care, including how the sick call system operates in his current facility.

25. Kenneth Windley (may call). Mr. Windley will testify to his chronic pain, his medical treatment under the MWAP Policy regime and his treatment since the MWAP Policy was rescinded and 1.24A was implemented. Mr. Windley will also testify about avenues to care, including how the sick call system operates in his current facility.

26. Sydney Melendez (may call). Ms. Melendez will testify regarding her efforts to schedule law student interviews with patient/witnesses in the early summer of 2023, including the dates of those visits and with whom the law students met.

Defendant Moores Witness List:

- Dr. Carol Moores (in person);
- Dr. Afsar A. Khan (video);
- NP Albert Acrish (video);
- Dr. Ann Andola (video);
- NP Mary Ashong (video);
- Dr. David DiNello (video);
- Dr. John Hammer (video);
- Dr. Kathleen Mantaro (video);
- Dr. David Karandy (video);
- Dr. Chung Lee (video);
- Dr. Susan Mueller (video);
- NP Kristin Salotti (video);
- Dr. Paula Bozer (video);
- Dr. Mikhail Gusman (video);
- Dr. John Morley (video);
- NP Valerie Monroe (video);
- NP Shibi Kacchapilly (video);
- NP Terrie Armbruster (video);
- NP Ashley Harris-Baker (video);
- Dr. Veronica Ruiz (video);
- Dr. Hend Abdelwahab (video);
- NP Randie Schrader (video);
- Dr. R. D'Amico (video);
- NP Sue Devlin-Varin (video);
- NP Ifeoma Awaka (video);
- NP Mahnaz Sullivan-Davachi (video);
- NP Angela Bode (video);
- Dr. Ellen Gomprecht (video);
- Dr. Brian Connolly (video);
- NP Brandi Corigliano (video);
- Dr. Arul Kannan (video);
- Dr. Pritti Mandalaywala (video);
- Dr. Kyoung Kim (video);
- NP Dahlia Wiggan (video);
- NP Haisy Ann Pitt (video);
- Dr. Gaetan Zamilus (video);
- Dr. Shazia Chaudhry (video);
- NP Katie Ngbodi (video);

x. DEPOSITION TESTIMONY DESIGNATIONPlaintiff Class's Position:

There will be no deposition testimony, as all witnesses listed as potential witnesses by both parties are available to testify.

Defendant Moores' Position:

Dr. Moores may offer the following deposition testimony either in her case in chief or on rebuttal:

- Mark Daniels Transcript, pp. 151:18-155:18; 172:3-175:3; pp. 180:24-184:6; pp. 188:18-190:4
- Wayne Stewart Transcript pp. 105:25-108:11

Defendant Moores reserves the right to read into evidence the deposition testimony of any witness who is not available to testify, or to impeach the witness.

xi. EXHIBITS TO BE OFFERED IN CASE IN CHIEF

a. Plaintiff's Exhibit List for Case in Chief

| EX. | Description (Basis for Admissibility) | Bates Range | Objection |
|-----|---|--|-----------|
| 1 | HSP 1.24, "Medications with Abuse Potential" | | |
| 2 | DOCCS' Health Services Policy Manual | MWAP 000348 – MWAP 000747 | |
| 3 | Medical Records, Wayne Stewart (Fed. R. Evid. 803 (3), (4), (6).) | WS 000001 – 002986; OAG WS 000001 – 000426; OAG MWAP 23135 – 23175, 30588 - -30604, 60501, 60662, 66394 – 66419, 73381 – 63411, 84930 – 85031, 95383 – 95501 | |
| 4 | Medical Records, Kenneth Windley (Fed. R. Evid. 803 (3), (4), (6).) | WINDLEY DEF 000001 – 925; MOORES 13945 – 13972 | |

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| 5 | Medical Records, Robert Oleman (Fed. R. Evid. 803 (3), (4), (6).) | RO 000001 – RO 000715: OLEMAN 000001 002097; FHS1 REFERRAL SUMMARY 000550; OLEMAN DEF 000001 – OLEMAN DEF 000012; MOORES 007592; OAG MWAP 080030 – OAG MWAP 080060; FHS1 REFERRAL SUMMARY 000233 – 000244 | |
| 6 | Medical Records, John Hinespeter (Fed. R. Evid. 803 (3), (4), (6).) | HINESPETER 000001 – 001603; HINESPETER DEF 000001 – HINESPETER 000335; MOORES 7792 – 7801; MOORES 11032 - 11042 | |
| 7 | Medical Records, Thomas Briel (Fed. R. Evid. 803 (3), (4), (6).) | BRIEL DEF 000001 – BRIEL DEF 000173; MOORES 10733 - 10744 | |
| 8 | Medical Records, Miguel Tirado (Fed. R. Evid. 803 (3), (4), (6).) | TIRADO 000001 – TIRADO 000132; MOORES 12573 - 12698 | |
| 9 | Medical Records, Alan Sherry (Fed. R. Evid. 803 (3), (4), (6).) | SHERRY 000001 – SHERRY 000476; MOORES 12524 - 12572 | |
| 10 | Medical Records, Marc Confessore (Fed. R. Evid. 803 (3), (4), (6).) | CONFESSORE 000001 – CONFESSORE 000591; CONFESSORE DEF 000001 – CONFESSORE 000627; MOORES 10757 - 10790 | |
| 11 | Medical Records, Eric Lindemann (Fed. R. Evid. 803 (3), (4), (6).) | LINDEMANN DEF 000001 – LINDEMANN DEF 000146; MOORES 11043 - 11047 | |
| 12 | Medical Records, Thomas Curry (Fed. R. Evid. 803 (3), (4), (6).) | CURRY 000001 – CURRY 000114; CURRY DEF 000001 – CURRY DEF 000123; MOORES 10878 – 10880 | |
| 13 | Medical Records, John Crosby (Fed. R. Evid. 803 (3), (4), (6).) | CROSBY 000001 – CROSBY 001432; CROSBY DEF 000001 – CROSBY DEF 001451; MOORES 10791 - 10877 | |
| 14 | Medical Records, James Pine, Sr. (Fed. R. Evid. 803 (3), (4), (6).) | PINE 000001 – PINE 000194; PINE DEF 000001 – PINE DEF 000183; MOORES 11281 - 11315 | |

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| 15 | Medical Records, Rafael Montanez (Fed. R. Evid. 803 (3), (4), (6).) | MONTANEZ DEF 000001 – MONTANEZ DEF 000707; MOORES 11171 - 11198 | |
| 16 | Medical Records, Richard Vasquez (Fed. R. Evid. 803 (3), (4), (6).) | OAG MWAP 081378 – 081390; Defs Email 0014024; OAG RV 000001 – 000383; R VASQUEZ T&M 1-5; OAG MWAP 060674; OAG MWAP 024430 – 39; OAG MWAP 005040 – 5042; OAG MWAP 003909 – 003910; RV 000001 – RV 000440; MOORES 12699 - 12721 | |
| 17 | Medical Records, Mark Daniels (Fed. R. Evid. 803 (3), (4), (6).) | MD 000001 – MD 001174; MDANIELS DEF 000001 – 000069; MOORES 451 – 552; MOORES 007594 – MOORES 007616; OAG MD 000001 - 001031; OAG MWAP 011343 – 011581; OAG MWAP 029758 – 029777; OAG MWAP 0053766 – OAG MWAP 0053768; OAG MWAP 066960 – OAG MWAP 067003; OAG MWAP 073177 – OAG MWAP 073181; OAG MWAP 084632 – 084636; OAG MWAP 095937 – OAG MWAP 095943; OAG MWAP 097922 – OAG MWAP 097938; OAG MWAP 098963 – OAG MWAP 098985; MOORES 10881 - 10890 | |
| 18 | Medical Records, Ramal Myriee (Fed. R. Evid. 803 (3), (4), (6).) | MOORES 7715 – MOORES 7730; MOORES 7816 – MOORES 7818; MYRIEE 000001 – MYRIEE 000233; MYRIEE DEF 000001 – MYRIEE DEF 000185; MOORES 11199 - 11280 | |
| 19 | Medical Records, Anthony Griggs (Fed. R. Evid. 803 (3), (4), (6).) | GRIGGS 000001 – GRIGGS 000102; MOORES 10891 - 11025 | |

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| 20 | Medical Records, Terry Mathis (Fed. R. Evid. 803 (3), (4), (6).) | OAG TM 000001 – 002706; OAG MWAP 081522 – 081531; MOORES 2181 – MOORES 2518; OAG MWAP 017182 – O17429; OAG MWAP 029921 – OAG MWAP 029957; OAG MWAP 060502; OAG MWAP 060531; OAG MWAP 060532; OAG MWAP 060580; MWAP OAG 060663; OAG MWAP 060804; OAG MWAP 061224; OAG MWAP 061256; OAG MWAP 061270; OAG MWAP 065764; OAG MWAP 073249; OAG MWAP 084776; OAG MWAP 085032; OAG MWAP 098237 – 098339; TM 000001 001062; MOORES 11048 - 11170 | |
| 21 | Medical Records, Anthony Jackson (Fed. R. Evid. 803 (3), (4), (6).) | A JACKSON DEF 000001 – A JACKSON DEF 000062; AJ 000001 – AJ 000073; OAG WAP 3778 – 3779; OAG MWAP 081545 – OAG MWAP 081553; OAG A JACKSON 000001 – OAG A JACKSON 000071; OAG MWAP 004742; OAG MWAP 004746; OAG MWAP 004750 – 52; OAG MWAP 005015; OAG MWAP 005425 – OAG MWAP 005427; OAG MWAP 007824; OAG MWAP 015481 – 15549; OAG MWAP 038709 – OAG MWAP 038723; OAG MWAP 038724 – OAG MWAP 38791; OAG MWAP 054872; OAG MWAP 055256; OAG MWAP 060519; OAG MWAP 060700; OAG MWAP 061208; OAG MWAP 061424; OAG MWAP 067365; OAG MWAP 068618; OAG MWAP 083068; OAG MWAP 096256 – OAG MWAP 096263; OAG MWAP 097404 – OAG MWAP 097407 | |

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| 22 | Medical Records, Ronald Alston (Fed. R. Evid. 803 (3), (4), (6).) | RALSTON 000001 – RALSTON 000461; RALSTON DEF 000001 – RALSTON DEF 000146; OAG MWAP 096154 – OAG MWAP 096255; OAG MWAP 064547; OAG MWAP 030804 – OAG MWAP 032359; OAG MWAP 03084 – OAG MWAP 032359; OAG MWAP 010005 – OAG MWAP 010159; OAG MWAP 009947 – OAG MWAP 010004; OAG MWAP 009876 – OAG MWAP 009946; OAG MWAP 006146 – OAG MWAP 006158; OAG MWAP 079547 – OAG MWAP 079560; MOORES 10476 - 10733 | |
| 23 | Medical Record Exhibits to the Report of Dr. Adam Carinci (Fed. R. Evid. 803 (3), (4), (6).) | Exhibits 2 – 69 | |
| 24 | MWAP Request Forms (Fed. R. Evid. 803 (3), (4), (6).); Dkt. No. 227 | See Attached Schedule 1 | |
| 23 | DOCCS' FORMULARY | MWAP 000455 – MWAP 000527 | |
| 24 | Medical Records, Tina Vivenzio (Fed. R. Evid. 803 (3), (4), (6).) | MOORES 12722 – 13844 | |
| 25 | Medical Records Joyce Powell (Fed. R. Evid. 803 (3), (4), (6).) | MOORES 11316 – 12523 | |
| 26 | Medical Records Matthew Herbert (Fed. R. Evid. 803 (3), (4), (6).) | MOORES 11026 – 11031 | |
| 27 | Medical Records Samson Burch (Fed. R. Evid. 803 (3), (4), (6).) | MOORES 10745 – 10756 | |
| 28 | SURN Reports and Chronic Pain Assessment Tools | MOORES 10092 – 10392 | |

Defendant Moores' Exhibits:

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| D-1(a) | MWAP POLICY 1.24 (revised 9/10/18) | | No objection |
| D-1(b) | MWAP POLICY 1.24 (6/1/17 with medications list) | | No objection |
| <u>D-2</u> | MWAP Policy 1.24A Health Services Policy 1.24A | | No objection |
| D-3 | 10/31/22 Email from Carol A. Moores, MD | | No objection |
| D-4 | Medical Records for Ronald Alston | RALSTON DEF 000001 – RALSTON DEF 000146; MOORES-10476 – MOORES-10543 | Fed. Rule Evid. 805; 602 |
| D-5 | Medical Records for Thomas Briel | BRIEL DEF 000001 – BRIEL DEF 000173; MOORES-10734 – MOORES-10744 | Fed. Rule Evid. 805; 602 |
| D-6 | Medical Records for Marc Confessore | CONFESSORE DEF 000003 – CONFESSORE DEF 38; CONFESSORE DEF 52; CONFESSORE DEF 101 – CONFESSORE DEF 126; CONFESSORE DEF 185 – CONFESSORE DEF 194; CONFESSORE DEF 209 – CONFESSORE DEF 213; CONFESSORE DEF 226 – CONFESSORE DEF 241; CONFESSORE DEF 367 – CONFESSORE DEF 396; CONFESSORE DEF 409 – CONFESSORE DEF 427; CONFESSORE DEF 595 – CONFESSORE DEF 627; MOORES-10760 – MOORES-10790 | Fed. Rule Evid. 805; 602 |
| D-7 | Medical Records for John Crosby | CROSBY DEF 000914 – CROSBY DEF 000963; CROSBY DEF 000965 – CROSBY DEF 001124; CROSBY DEF 001223 – CROSBY DEF 001451; MOORES-10791 – MOORES-10877 | Fed. Rule Evid. 805; 602 |

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| D-8 | Medical Records for Thomas Curry | CURRY 000001 – CURRY 000114; CURRY DEF 000001 – CURRY DEF 000123; MOORES-10878 – MOORES-10879 | Fed. Rule Evid. 805; 602 |
| D-9 | Medical Records for Mark Daniels | MDANIELS DEF 000028 – MDANIELS DEF 000033; MDANIELS DEF 000034 – MDANIELS DEF 000039; MDANIELS DEF 000040 – MDANIELS DEF 000054; MDANIELS DEF 000055 – MDANIEL DEF 000069; MOORES-10881 – MOORES-10890 | Fed. Rule Evid. 805; 602; 602 |
| D-10 | Medical Records for Anthony Griggs | GRIGGS 000001 – GRIGGS 000102; GRIGGS 000103 – GRIGGS 000108; GRIGGS 000109; MOORES-10891 – MOORES-11025 | Fed. Rule Evid. 805; 602 |
| D-11 | Medical Records for John Hinespeter | HINESPETER DEF 000002 – HINESPETER DEF 000335; MOORES-11032 – MOORES-11042 | Fed. Rule Evid. 805; 602 |
| D-12 | Medical Records for Anthony Jackson | AJ 000001 – AJ 000060; AJ 000074 – AJ 000075; A JACKSON DEF 000001 – A JACKSON DEF 000062 | Fed. Rule Evid. 805; 602 |
| D-13 | Medical Records for Eric Lindemann | LINDEMANN DEF 000001 – LINDEMANN DEF 000146; MOORES-11043 – MOORES-11047 | Fed. Rule Evid. 805; 602 |
| D-14 | Medical Records for Terry Mathis | OAG TM 002449 – OAG TM 002515; OAG TM 002516 – OAG TM 002560; OAG TM 002561 – OAG TM 002706; MOORES-11048 – MOORES-11170 | Fed. Rule Evid. 805; 602 |
| D-15 | Medical Records for Rafael Montanez | MONTANEZ DEF 000001 – MONTANEZ DEF 000075; MONTANEZ DEF 000083 – | Fed. Rule Evid. 805; 602 |

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| | | MONTANEZ DEF 000084; MONTANEZ DEF 000099; MOORES- 11171 – MOORES- 11198 | |
| D-16 | Medical Records for Ramal Myrie | MYRIEE 000010 – MYRIEE 00047; MYRIEE 000059 – MYRIEE 000060; MYRIEE 000062 – MYRIEE 00070; MYRIEE 000073 – MYRIEE 000134; MYRIEE DEF 000007 – MYRIEE DEF 000072; MYRIEE DEF 000075 – MYRIEE DEF 000080; MYRIEE DEF 000084 – MYRIEE DEF 000091; MYRIEE DEF 000093 – MYRIEE DEF 000101; MYRIEE DEF 000123 – MYRIEE DEF 000130; MYRIEE DEF 000132 – MYRIEE DEF 000145; MYRIEE DEF 000147 – MYRIEE DEF 000159; MYRIEE DEF 000161 – MYRIEE DEF 000165; MOORES- 11200 – MOORES-11280 | Fed. Rule Evid. 805; 602 |
| D-17 | Medical Records for Robert Oleman | OLEMAN DEF 000001 – OLEMAN DEF 000028; MOORES- 4032 | Fed. Rule Evid. 805; 602 |
| D-18 | Medical Records for James Pine | PINE DEF 000001 – PINE DEF 000183; MOORES-11281 – MOORES-11315; MOORES-13973 – MOORES-13989 | Fed. Rule Evid. 805; 602 |
| D-19 | Medical Records for Alan Sherry | SHERRY 000001 – SHERRY 000015; SHERRY 000078 – SHERRY 000124; SHERRY 000359 – SHERRY 000375; MOORES-12524 – MOORES-12572 | Fed. Rule Evid. 805; 602 |
| D-20 | Medical Records for Wayne Stewart | OAG WS 000221 – OAG WS 000438 | Fed. Rule Evid. 805; 602 |
| D-21 | Medical Records for Miguel Tirado | TIRADO 000133 – TIRADO 000248; MOORES-12573 – MOORES-12698 | Fed. Rule Evid. 805; 602 |
| D-22 | Medical Records for Richard | OAG MWAP 005040 – OAG | Fed. Rule Evid. 805; |

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| | Vasquez | MWAP 005042; OAG RV 000001 – OAG RV 000297; RV 000001 – RV 000068; RV 000273 – RV 000383; MOORES-12699 – MOORES-12721 | 602 |
| D-23 | Medical Records for Kenneth Windley | WINDLEY DEF 000742 – WINDLEY DEF 000772; WINDLEY DEF 000895 – WINDLEY DEF 000906; WINDLEY DEF 000907 – WINDLEY DEF 000925; MOORES-13945 – MOORES-13972 | Fed. Rule Evid. 805; 602 |
| D-24 | Medical Records for Matthew Herbert | HERBERT DEF 000001 – HERBERT DEF 0000194; MOORES-11026 – MOORES-11031 | Fed. Rule Evid. 805; 602 |
| D-25 | Medical Records for Tina Vivenzio | MOORES-12776; MOORES-12793 – MOORES-12837; MOORES-12871 – MOORES-12889; MOORES-12893; MOORES-12899; MOORES-12916; MOORES 13017 – MOORES-13030; MOORES-13033 – MOORES-13044; MOORES-13046 – MOORES-13047; MOORES-13060; MOORES-13119; MOORES-13121 – MOORES-13128; MOORES-13131; MOORES-13133 – MOORES-13138; MOORES-13160 – MOORES-13176; MOORES-13563 – MOORES-13601; MOORES-13604 – MOORES-13610; MOORES-13613 – MOORES-13621; MOORES-13637 – MOORES-13653; MOORES-13657 – MOORES-13666; | Fed. Rule Evid. 805; 602 |

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| | | MOORES-13689 – MOORES-13706; MOORES-13711 – MOORES-13714; MOORES-13716 – MOORES-13807; MOORES-13848 – MOORES-13860; MOORES-13863 – MOORES-13879; MOORES-13891 – MOORES-13913 | |
| D-26 | Medical Records for Joyce Powell | MOORES-11316 – MOORES-11321; MOORES-11329; MOORES-11365 – MOORES-11451; MOORES-11469 – MOORES-11474; MOORES-11478 – MOORES-11485; MOORES-11501 – MOORES-11507; MOORES-11540 – MOORES-11548; MOORES-11690; MOORES-11856 – MOORES-11857; MOORES-11859 – MOORES-11860; MOORES 11863-11869; MOORES 11871-11890; MOORES 11896-11899; MOORES 11903-11983; MOORES 12048-12050; MOORES 12051; MOORES 12054-12069; MOORES 12074-12081; MOORES 12087-12088; MOORES 12090; MOORES 10294-12096; MOORES 12113-12171; MOORES 12222-12223; MOORES 12355-12366; MOORES 12424-12432; MOORES 12463; MOORES 12473; MOORES 12479-12482; 12488-12489; MOORES 12494-12496; 12499; MOORES 12503; MOORES 12507-12516; MOORES 12520-12523 | Fed. Rule Evid. 805; 602 |
| D-27 | Medical Records for Samson Burch | BURCH DEF 000029 – BURCH DEF 000047; | Fed. Rule Evid. 805; 602 |

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| | | BURCH DEF 000133-BURCH DEF 000155; MOORES 10749-MOORES 12523 | |
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xii. RELIEF SOUGHT

Plaintiffs request permanent injunctive relief in the form already ordered by the Court in the Preliminary Injunction Ordered June 12, 2023. (Dkt. No. 602.)

Dated: September _____, 2023
New York , New York

Hon. Loretta A. Preska, U.S.D.J.

SCHEDULE 1 to PLAINTIFF’S EXHIBIT LIST

MWAP REQUEST FORM EXHIBITS

087020 – 087022, 089393-08394, 092080 093021, 089527 – 089531, 089177, 000030 – 000031, 000044 – OAG MWAP 000045, 000268, 001269, 000333, 000334, 000453, 000454, 000455, 000456, 000586, 000587, 000588, 000589, 000647, 000648, 000657, 000658, 85120, 85130, 85136, 85142, 85143, 85160, 85161, 85162, 85168, 85173, 85176, 85182, 85183, 85186, 85188, 85189, 85205, 85208, 85209, 85214, 85215, 85218, 85222, 85224, 85246, 85249, 85255, 85256,

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